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April 5, 2011

Robert E. Feldman, Executive Secretary  
Attention: Request for Comments  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

**Proposed Rule Requiring Certain Bank Staff to Complete FDIC-Provided Training on Deposit Insurance Coverage FIL-6-2011**

Dear Mr. Feldman:

BOK Financial Corporation (BOKF) appreciates the opportunity to comment on the proposed rulemaking to 12 CFR Part 330 – Deposit Insurance Coverage. BOKF is a \$24 billion regional financial services company based in Tulsa, Oklahoma. The company's stock is publicly traded on NASDAQ under the symbol: BOKF. Our assets are primarily centered in BOKF, NA, with separate divisions labeled according to our markets: Bank of Oklahoma, Bank of Texas, Bank of Albuquerque, Bank of Arkansas, Bank of Arizona, Colorado State Bank and Trust, and Bank of Kansas City.

The FDIC seeks comments with respect to the following questions. Our comments and recommendations are presented in **bold face font**.

- Does the proposed rule strike the right balance between meeting depositors' need for accurate deposit insurance information and the potential cost to and regulatory burden on IDIs?

**Partially. We agree IDI employees should be well educated on the basic principals of deposit insurance coverage. We pose no objection to an annual training requirement for employees with the authority to open accounts or respond to customer inquiries regarding deposit insurance coverage. However, as proposed the rule would substantially increase an IDI's burden of administering such a training program. Most IDIs currently provide computer based education to their employees. These computer based education systems have integrated learning management systems that allow IDIs to assign training courses and efficiently track employees' progression. We believe any courses provided by the FDIC should be flexible enough to allow IDIs to incorporate those into their existing learning**

management systems. Alternatively, we suggest the FDIC develop a list of approved training vendors whose existing computer based courses on deposit insurance coverage would serve as an acceptable substitute for the FDIC developed course.

- Is the scope of the proposed rule appropriate? In its present form, the rule would require training for all IDI employees with authority to open accounts and/or respond to customers' inquiries on deposit insurance coverage. Should the training extend to all employees who work in bank retail offices, not just the employees with these specific responsibilities?

**The scope of the rule appears appropriate. Training of IDI employees should extend only to those employees with authority to open accounts and/or respond to customers' inquiries on deposit insurance coverage.**

- The rule would require IDI employees to inquire whether the customer has an ownership interest in any other deposit accounts at the IDI and, if so, whether the customer's total ownership interest in deposit accounts, including the new account, exceeds the Standard Maximum Deposit Insurance Amount. Should the inquiry only apply to aggregated deposits that exceed the SMDIA of \$250,000 or to aggregated deposits that may approach the SMDIA? And if so, what dollar amount or percentage of the SMDA should trigger the obligation to provide depositors with the FDIC's *Deposit Insurance Summary* publication?

**The inquiry could be simplified by asking the customer if they have additional deposits at the IDI that, when aggregated, exceed \$250,000. Asking the IDIs to inquire only when aggregated deposits exceed \$250,000 would eliminate potential confusion for both the IDI employees and the customers.**

- In addition to requiring IDIs to make EDIE available on their websites, should the FDIC require IDIs to maintain, in their retail office lobbies, a dedicated computer terminal containing the EDIE application, which all customers could use on their own, or with assistance from IDI employees, to generate reports on the customer's deposit insurance coverage?

**Requiring IDIs to maintain a dedicated computer terminal in each of their retail office lobbies would not be a reasonable solution from a cost perspective or a physical space issue. This would require the purchase of hundreds of terminals as well as the training of a large amount of employees. Requiring IDIs to provide a link to EDIE on their website will provide sufficient information regarding FDIC coverage to the depositor.**

- In addition to requiring IDIs to provide the FDIC *Deposit Insurance Summary* publication to depositors whose combined deposits at the IDI exceed the SMDIA, should IDIs be required to make this publication available in their retail office lobbies so all depositors have access to the important information?

This would not be an efficient use of resources. Customers with monies near or exceeding the SMDIA limit are sophisticated enough to inquire about structuring accounts to obtain maximum coverage. Those customers that do not would not be interested in the publication.

- Should the CBI software program include a feature that would allow IDIs to confirm that training has been completed by covered employees?

A better approach would be to work with IDIs to enable them to track their training on existing learning management systems, rather than having to manage information from a third-party non-integrated source. Most IDIs currently use computer based training to train employees on a variety of other regulations. Allowing IDIs to incorporate deposit insurance training courses into their existing learning management systems would provide more effective monitoring and course administration. As noted above, we believe any courses provided by the FDIC should be flexible enough to allow IDIs to incorporate those into their existing learning management systems. Alternatively, we suggest the FDIC develop a list of approved training vendors whose existing computer based courses on deposit insurance coverage would serve as an acceptable substitute for the FDIC developed course.

Again, BOKF appreciates the opportunity to comment on this proposed rule. We welcome the opportunity to work with the Federal Deposit Insurance Corporation to enhance consumer awareness. Should you have any questions regarding our recommendations or need further detail, please contact me at 918-488-7378.

Sincerely,



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